

1 [Submitting Counsel on Signature Page]

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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12 IN RE: JUUL LABS, INC., MARKETING,
13 SALES PRACTICES, AND PRODUCTS
14 LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**STIPULATION AND [PROPOSED]
ORDER TO AMEND TRIBAL CASE
SCHEDULE**

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This Document Relates to:

Judge: Hon. William H. Orrick

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*Cheyenne and Arapaho Tribes of Oklahoma
v. Juul Labs, Inc. et al.*, Case No. 3:21-cv-
05134.

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*Fond Du Lac Band of Lake Superior
Chippewa v. Juul Labs, Inc., et al.*, Case No.
3:20-cv-03995

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Klamath Tribes v. Juul Labs, Inc., et al., Case
No. 3:20-cv-03987

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The parties jointly stipulate and agree, subject to the Court's approval, to amend certain
deadlines applicable in the above-captioned cases.

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WHEREAS, at the Case Management Conference on May 6, 2024, the Court stated that it
would grant the parties' request to modify pretrial deadlines in the Tribal bellwether litigation as
set forth in the parties' Joint Case Management Statement. *See* Dkt. No. 4220 (outlining the
parties' proposed amended schedule).

1 WHEREAS, following the May 6, 2024 case Management Conference, the parties met
 2 and conferred further and, in order to accommodate the schedules of the parties and subject to the
 3 Court's approval, jointly propose the following revised schedule for the deadlines below:

4 5 Event	6 Current Deadline 7 (Dkt. No. 4220)	8 Proposed Deadline
9 Depositions of Defendants' 10 Experts ¹	11 June 17, 2024	12 August 16, 2024
13 Deadline to file Summary 14 Judgment and <i>Daubert</i> 15 Motions	16 July 16, 2024	17 September 14, 2024
18 Deadline to file Oppositions 19 to Summary Judgment and 20 <i>Daubert</i> Motions	21 September 13, 2024	22 November 12, 2024
23 Deadline to file Replies in 24 support of Summary 25 Judgment and <i>Daubert</i> 26 Motions	27 October 17, 2024	28 December 16, 2024

16 THEREFORE, the parties therefore respectfully request that the Court enter an Order
 17 establishing the above deadlines.

27 1 Plaintiffs reserve their right to seek submission of rebuttal expert reports following submission
 28 of Defendants' expert reports and deposition of Defendants' experts. Defendants dispute that
 29 rebuttal expert reports would be appropriate, and reserve all rights to contest any attempt by
 30 Plaintiffs to seek their submission.

1 Dated: May 16, 2024

Respectfully submitted,

2 By: /s/ Geoffrey D. Strommer

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2024, I electronically filed the foregoing document and all attachments thereto with the Clerk of the Court using the CM/ECF system, which will automatically send notification of filing to all counsel of record.

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